

**THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**In re: OTIS DEVONTE MCFADDEN §
 AND §
 TRENICIA QUINTESHA §
 TRANEQUA MILES §**

Cause no. 22-10702

Chapter 13

MOTION FOR RELIEF FROM AUTOMATIC STAY

1. Movant, Pflugerville Leased Housing Associates (TIC-1), LLLP, petitions this Court for relief from the automatic stay under 11 U.S.C. § 362(d)(1).
2. Movant is the owner and lessor of the real property located 16702 North Heatherwilde Blvd Apt 1222, Pflugerville, Texas 78660.
3. Debtor is the tenant in possession, under a written lease, of the property at located 16702 North Heatherwilde Blvd Apt 1222, Pflugerville, Texas 78660. A copy of the lease is attached as Exhibit "A".
4. Debtor filed a Chapter 13 petition in this bankruptcy court on October 25, 2022.
5. Debtor failed to make rental payments under the subject lease since on or about September 1, 2022.
6. As of the date of this filing, Debtor has not cured the default since the bankruptcy filing. A copy of the ledger is attached as Exhibit "B".
7. Based on the foregoing, movant seeks termination of the automatic stay to allow Movant to continue suit, to repossess the property, and seeks to recover its costs and reasonable attorney's fees.

WHEREFORE, Movant requests an order for relief from the automatic stay.

/s/ Brandy Alexander
Brandy Alexander
State Bar No. 24108421
S.D Tex. Bar No. 3481068
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Houston, Texas 77004
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NOTICE

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 14 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document and the Affidavit as required by Local Bankruptcy Rule 4001(a)(1)(B) was served on March 3, 2023 by the Court's ECF noticing system or First Class Mail on the Debtors, Debtors' counsel, and the Trustee.

Debtors

Otis Devonte McFadden
16701 North Heatherwilde Blvd Apt 1222
Pflugerville, Texas 78660

Via First Class Mail

Trenicia Quinteshia Tranequa Miles
16701 North Heatherwilde Blvd Apt 1222
Pflugerville, Texas 78660

Via First Class Mail

Counsel for Debtor

ALLMAND LAW
Nicholas C. Inman
860 Airport Freeway, Ste 401
Hurst, Texas 76054

Via ECF and/or email

Trustee

Deborah B. Langehenning
PO Box 91419
Austin, Texas 78707

Via ECF and/or email

/s/ Brandy M. Alexander
Brandy M. Alexander